

42-045-00010

Monroe Energy, LLC
Trainer Refinery
4101 Post Road
Trainer, PA 19061
(610) 364-8000

July 18, 2019

VIA FEDEX 7757 6386 5743

JUL 1 9 2019

Mr. James Rebarchak Regional Manager - Air Quality Commonwealth of Pennsylvania Pennsylvania Depart of Environmental Protection 2 East Main St. Norristown, PA 19401

RE: MONROE ENERGY TRAINER REFINERY 2019 SEMI ANNUAL LDAR REPORTS, January 1, 2019 through June 30, 2019

Dear Mr. Rebarchak:

As required by Title 40, Part 60 Monroe Energy Trainer Refinery hereby submits the following Semi-Annual LDAR Reports for the time period January 1, 2019 to June 30, 2019

- 1. NSPS LDAR Report, per 40 CFR §60.480, Subpart VV/GGG:
 - Compliance Monitoring Summary
 - Compliance Repair Delay List
 - Repair Delayed History Components Repaired During Reporting Period
 - Summary of Components Added and Deleted During Reporting Period
- 2. REFINERY MACT (RMACT HAP Units) LDAR Report, per 40 CFR, Part 63, Subpart CC:
 - Compliance Monitoring Summary
 - Compliance Repair Delay List
 - Repair Delayed History Components Repaired During Reporting Period.
 - Summary of Components Added and Deleted During Reporting Period.

3. GGGa LDAR Report, per 40 CFR §60.590a, Subpart VVa/GGGa:

- Compliance Monitoring Summary
- Compliance Repair Delay List
- Repair Delayed History Components Repaired During Reporting Period.
- Summary of Components Added and Deleted During Reporting Period.

As required by the Consent Decree H-05-0258, paragraph 236, Monroe Energy is hereby notifying you that the report leak rates contained herein for valves and pumps are the applicable regulatory leak definitions in Title 40 CFR, 60.482. In addition to the aforementioned Consent Decree, there were no valves with leak rates of over 10,000 ppm that required a Drill and Tap.

Should you have any questions or comments regarding this report, please contact Stephani Ski Szymanski, Environmental Engineer and Program Lead, at (610) 364-8073.

Sincerely,

Matthew Torell, PE Environmental Leader

Enclosures (1)

Cc:

Ms. Zelma Maldonado
Associate Director,
Office of Air Enforcement,
Compliance and Assistance
USEPA Region III
Air Protection Division
3AP20
1650 Arch Street
Philadelphia, Pa 19103-1129
VIA FEDEX 7757 6382 0049



Monroe Energy, LLC 4101 Post Road Trainer, PA 19061 (610) 364-8000

Responsible Official Certification

Based upon information and belief formed after a reasonable inquiry, I, as a responsible official of the above-mentioned facility, certify the information contained in this report is accurate and true to the best of my knowledge.

Michael Capone, Refinery Leader

MONROE ENERGY TRAINER REFINERY 2019 SEMI ANNUAL LDAR REPORTS, January 1, 2019 through June 30, 2019

Attachment 1: NSPS LDAR Report, per 40 CFR §60.480, Subpart VV/GGG

MONROE ENERGY TRAINER REFINERY NSPS EPA VV/GGG LDAR SEMI ANNUAL REPORT SUMMARY

REPORT DATE: JULY 9, 2019

UNIT	CLASS	MONTH	MONITORED	LEAKDE	LATE REPAIR
543 CRUDE				The second secon	THE REI AIR
<u> </u>	PUMP	1	2.		
	PUMP	1 2	4	0	0
	PUMP	3	4	0	0
	PUMP	4	4	0	0
	PUMP	5	4	0	0
	PUMP	6	4	0	0
	VALVE	1	4 9	0	0
	VALVE	2	1,071	0	0
	VALVE	3	3	3	0
	VALVE	4	3	0	0
	VALVE	5	1,069	0	0
	VALVE	6	2	2	0
		Ü	2	0	0
			<u>2,181</u>	<u>5</u>	<u>o</u>
544 CRUDE					
	PUMP	1	15	0	5200
	PUMP	2	15	0	0
	PUMP	3	15	0	0
	PUMP	4	15	0	0
	PUMP	5	15	0 0	0
	PUMP	6	15	0	0
	VALVE	1	2	0	0
	VALVE	2	1,167	0	0
	VALVE	5	1,167	0	0
			2,426	<u>o</u>	
44 VACUUM			- 	<u>s</u>	<u>o</u>
	PUMP	1	•	10000	
	PUMP	2	2	0	0
	PUMP	3		0	0
	PUMP	4	2	0	0
	PUMP	5	2	0	0
	PUMP	6	2	0	0
	VALVE	2	399	0	0
	VALVE	5	398	0	0
		· ·	390	0	0
			809	<u>o</u>	<u>o</u>
<u>LKY</u>					
	PUMP	1	26	0	0
	DUMAN			•	U
	PUMP	2	27	0	0

	PUMP	4	27	0	0
	PUMP	5	27	0	0
	PUMP	6	27	0	0
	VALVE	1	1,485	3	0
	VALVE	2	3,280	8	0
	VALVE	3	64	0	0
	VALVE	4	10	0	0
	VALVE	5	3,303	6	0
	VALVE	6	9	1	0
					U
			8,312	<u>18</u>	<u>0</u>
A. B. A. B. L. G.			-		<u>u</u>
AMINE					
	PUMP	1	2	0	0
	PUMP	2	2	0	0
	PUMP	3	2	0	0
	PUMP	4	2	O	0
	PUMP	5	2	0	0
	PUMP	6	2	0	0
	VALVE	1	360	1	0
	VALVE	2	3	0	0
	VALVE	3	1	0	0
	VALVE	4	361	0	0
	VALVE	5	4	0	0
					Ü
			<u>741</u>	1	<u>o</u>
<u>AWWTP</u>				55 0	_
2377711	\/A1\/=				
	VALVE	1	140	0	0
	VALVE	4	140	0	0
			<u>280</u>	<u>o</u>	<u>o</u>
BLEND					
	PUMP	1	10	. 25	
	PUMP	2	18	0	0
	PUMP	3	18	0	0
	PUMP	4	18	0	0
	PUMP	5	18	0	0
	PUMP	6	17	0	0
	VALVE	1	18	0	0
	VALVE	2	1,435	4	0
	VALVE	3	4	0	0
	VALVE	4	4	0	0
	VALVE	5	1,432	3	0
	VALVE		5	0	0
	VALVE	6	3	0	0
			2 000	<u> </u>	
			<u>2,990</u>	<u>7</u>	<u>o</u>
BOILER 14					
	VALVE	1	1	0	0
	VALVE	2	49	0	0
	VALVE	3	49	0	0
	VALVE	5	49	0	0
				95,00	· ·

	VALVE	6	49	0	0
			<u>197</u>	<u>o</u>	<u>o</u>
BOILERS 9 & 10				1 77	×
	VALVE	2	440		
	VALVE	3	439	0	0
	VALVE	4	1	1 0	0
	VALVE	5	439	1	0
	VALVE	6	439	0	0
			<u>1,758</u>	<u>2</u>	<u>0</u>
BUTANE				-	_
	VALVE	1	3	0	2
	VALVE	2	301	0	0
	VALVE	5	304	0	0
			608	<u>o</u>	•
DESALT				⊻	<u>0</u>
	PUMP	1	10		
	PUMP	2	10	0	0
	PUMP	3	10	0	0
	PUMP	4	10	0	0
	PUMP	5	10	0	0
	PUMP	6	10	0	0
	VALVE	1	813	2	0
	VALVE	2	2	0	0
	VALVE	3	2	0	0
	VALVE	4	811	0	0
			<u>1,688</u>	<u>2</u>	<u>o</u>
DIESEL				_	_
	PUMP	.48	0007		
	PUMP	1 2	11	0	0
	PUMP	3	11	0	0
	PUMP	4	11 11	0	0
	PUMP	5	11	0	0
	PUMP	6	11	0	0
	VALVE	1	778	0 3	0
	VALVE	2	3	0	0
	VALVE	3	3	0	0
	VALVE	4	778	1	0
	VALVE	5	1	0	0
	VALVE	6	1	0	0
			1,630	<u>4</u>	<u>o</u>
<u>FCC</u>				1550	
	PUMP	1	25	0	0
	PUMP	2	25	0	0
	PUMP	3	25	1	0

	PUMP	4	25	0	0
	PUMP	5	24	0	0
	PUMP	6	25	0	0
	VALVE	1	79	0	0
	VALVE	2	2,203	2	0
	VALVE	3	6	0	0
	VALVE	4	2	0	0
	VALVE	5	2,274	5	0
	VALVE	6	6	0	0
			4,719	<u>8</u>	<u>o</u>
FLARE					-
	PUMP	1			
	PUMP	2	3	0	0
	PUMP	3	3	0	0
	PUMP	4	3	0	0
	PUMP	5	3	0	0
	PUMP	6	3	0	0
	VALVE	3	221	0	0
	VALVE	6	222	0	0
			222	0	0
			<u>461</u>	<u>o</u>	•
EL ADE CAS D	F001/F51/		1	₹	<u>0</u>
FLARE GAS R					
	PUMP	1	7	0	0
	PUMP	2	7	0	0
	PUMP	3	7	0	0
	PUMP	4	7	0	0
	PUMP	5	7	0	0
	PUMP	6	7	0	0
	VALVE VALVE	3	1,048	0	0
	VALVE	6	1,047	0	0
			2.427		
			<u>2,137</u>	<u>o</u>	<u>0</u>
ISOCRK					
	PUMP	1	17	0	0
	PUMP	2	18	0	0
	PUMP	3	18	0	0
	PUMP	4	18	0	0
	PUMP	5	18	0	0
	PUMP	6	18	0	0
	VALVE	1	3,132	7	0
	VALVE	2	21	0	0
	VALVE	3	7	0	0
	VALVE	4	3,129	5	0
	VALVE	5	5	0	0
	VALVE	6	5	0	0
			<u>6,406</u>	<u>12</u>	<u>o</u>
KERO					
	PUMP	1	9	0	_
				U	0

	PUMP	2	9	0	0
	PUMP	3	9	0	0
	PUMP	4	9	0	0
	PUMP	5	9	0	0
	PUMP	6	9	0	0
	VALVE	1	1,525	3	0
	VALVE	2	6	0	0
	VALVE	3	3	0	0
	VALVE	4	1,525	2	0
	VALVE	5	2	0	0
	VALVE	6	2	0	0
			<u>3,117</u>	<u>5</u>	<u>o</u>
LOWLN					-
	PUMP		7.20		
	PUMP	1	6	0	0
	PUMP	2	6	0	0
	PUMP	3	6	0	0
	PUMP	4	6	0	0
	PUMP	5	6	0	0
	VALVE	6	6	0	0
	VALVE	1	574	2	0
	VALVE	2	2	0	0
	VALVE	4	2	0	0
	VALVE	5	584	1	0
	VALVE	6	11	1	0
	111111111111111111111111111111111111111	o	1	0	0
			1 240	10. 4 17	
			<u>1,210</u>	<u>4</u>	<u>o</u>
MARINE					
	PUMP	1	2	0	0
	PUMP	2	2	0	0
	PUMP	3	2	0	0
	PUMP	4	2	0	0
	PUMP	5	2	0	0
	PUMP	6	2	0	0
	VALVE	1	2	0	0
	VALVE	2	288	0	0
	VALVE	5	290	0	0
			<u>592</u>	<u>o</u>	<u>o</u>
NAPHTH					
	PUMP	1	40		
	PUMP	2	16	0	0
	PUMP	3	16	0	0
	PUMP	4	16	0	0
	PUMP	5	16 16	0	0
	PUMP	6	16	0	0
	VALVE	1	16	1	0
	VALVE	2	7 4	0	0
	VALVE	3	1,505	0	0
		,,	1,003	3	0

	VALVE	4	6	0	0
	VALVE	5	6	0	0
	VALVE	6	1,515	3	0
			<u>3,139</u>	<u>7</u>	<u>o</u>
PLATFO				-	⊻
W == =================================	PUMP	1	8	0	
	PUMP	2	8	0	0
	PUMP	3	8	0	0
	PUMP	4	8	0	0
	PUMP	5	8	0	0
	PUMP	6	8	0	0
	VALVE	1	12	0	
	VALVE	2	6	0	0
	VALVE	3	2,151	3	0
	VALVE	4	3	0	0
	VALVE	5	3	0	0
	VALVE	6	2,161	5	0
			4,384	<u>8</u>	0
PRORCL				2	<u>0</u>
- HOHOL	PUMP				
	PUMP	1 2	1	0	0
	PUMP	3	a <u>1</u>	0	0
	PUMP	4	1	0	0
	PUMP	5	1 1	0	0
	PUMP	6	1	0	0
	VALVE	3	332	0	0
	VALVE	4	2	2 0	0
	VALVE	5	2	0	0
	VALVE	6	330	4	0
			<u>672</u>	<u>6</u>	
PROREC)	<u>u</u>	<u>0</u>
	PUMP	1	2	200	
	PUMP	2	2	0	0
	PUMP	3	2	0	0
	PUMP	4	2	0	0
	PUMP	5	2	0	0
	PUMP	6	2	0 0	0
	VALVE	2	646	3	0
	VALVE	3	3	0	0
	VALVE	4	3	0	0
	VALVE	5	638	6	0
	VALVE	6	8	0	0
			<u>1,310</u>	<u>9</u>	<u>o</u>
DDOCTO				-	2
<u>PROSTO</u>	B				
	PUMP	1	3	0	0
	PUMP	2	3	0	0

	PUMP	3	3	0	0
	PUMP	4	4	0	0
	PUMP	5	4	0	0
	PUMP	6	4	0	0
	VALVE	1	530	2	0
	VALVE	2	2	0	0
	VALVE	3	3	0	0
	VALVE	4	530	1	0
	VALVE	5	1	0	0
	VALVE	6	2	0	0
			<u>1,089</u>	<u>3</u>	<u>o</u>
REFORM				_	_
	PUMP	1	8	0	20
	PUMP	2	8	0	0
	PUMP	3	8	0	0
	PUMP	4	8	0	0
	PUMP	5	8	0	0
	PUMP	6	8	0	0
	VALVE	2	825	2	0
	VALVE	3	18	0	0
	VALVE	4	2	0	
	VALVE	5	823	1	0
	VALVE	6	15	0	0
			1,731	<u>3</u>	0
SOUR			<u> </u>	2	<u>0</u>
SOUR					
	VALVE	2	53	0	0
	VALVE	5	53	0	0
			<u>106</u>	<u>o</u>	<u>0</u>
SOUTH TANK F	<u>ARM</u>				
	PUMP	1	25	0	0
	PUMP	2	24	0	0
	PUMP	3	24	0	0
	PUMP	4	25	0	0
	PUMP	5	25	0	0
	PUMP	6	24	0	0
	VALVE	1	1	0	0
	VALVE	2	1	0	0
	VALVE	3	2,639	3	0
	VALVE	4	15	0	0
	VALVE	5	13	0	0
	VALVE	6	2,641	2	0
			<u>5,457</u>	<u>5</u>	<u>0</u>
SRU					1000
	VALVE	1	77	*******	
	VALVE	4	77	0	0
		7	76	0	0

			<u>153</u>	<u>0</u>	<u>o</u>
TAIL GAS			11 -2-2-1 .	D=0	<u> </u>
TAIL GAS	VALVE				
	VALVE	1 2	162	0	0
	VALVE		2	0	0
	VALVE	4 5	162	1	0
	VALVE	6	1	0	0
		Ü	1	0	0
			328	1	•
				1	<u>0</u>
<u>TF</u>					
	PUMP	1	10	0	0
	PUMP	2	10	0	0
	PUMP	3	10	1	0
	PUMP	4	10	0	0
	PUMP	5	10	0	0
	PUMP VALVE	6	10	0	0
	VALVE	3	896	0	0
	VALVE	6	896	1	0
			1 050	320	
			<u>1,852</u>	<u>2</u>	<u>o</u>
ULSG					
	PUMP	1	8	0	0
	PUMP	2	8	0	0
	PUMP	3	8	0	0
	PUMP	4	8	0	0
	PUMP	5	8	0	0
	PUMP	6	8	0	0
	VALVE	1	3	0	0
	VALVE	2	3	0	0
	VALVE	3	2,153	5	0
	VALVE	4	6	0	0
	VALVE	5	5	0	0
	VALVE	6	2,152	5	0
			4,370	<u>10</u>	<u>o</u>
VACUUM					
	PUMP	1	2	0	0
	PUMP	2	2	0	0
	PUMP	3	2	0	0
	PUMP	4	2	0	0
	PUMP	5	2	0	0
	PUMP	6	2	0	0
	VALVE	1	496	3	0
	VALVE	2	5	0	0
	VALVE	3	3	0	0
	VALVE	4	496	1	0
	VALVE	5	1	0	0
	VALVE	6	1	0	0
			u paren		
			<u>1,014</u>	<u>4</u>	<u>o</u>

<u>VGO</u>

	TOTAL:	69,132	131	0
		1,265	<u>5</u>	<u>o</u>
VALVE	6	3	0	0
VALVE	5	4	0	0
VALVE	4	622	3	0
VALVE	3	2	0	0
VALVE	2	3	0	0
VALVE	1	625	2	0
PUMP	6	1	0	0
PUMP	5	1	0	0
PUMP	4	1	0	0
PUMP	3	1	0	0
PUMP	2	1	0	0
PUMP	1	1	0	0

MONROE ENERGY TRAINER REFINERY PLACED ON DELAY OF REPAIR

EPA VV/GGG REPORT

REPORT DATE: JULY 9, 2019

REPORT COMPLIANCE PERIOD: JANUARY 1, 2019 TO JUNE 30, 2019

NO COMPO	ONENTS WERE	PLACED ON DELAY	PLACED ON DELAY OF REPAIR FOR THE REPORTING PERIOD
		OIL DELINI	THE REPORTING PERIOD
	-		O CONTRACTOR OF THE PROPERTY O

MONROE ENERGY TRAINER REFINERY
REMOVED FROM DELAY
EPA VV/GGG REPORT
REPORT DATE: JULY 9, 2019
REPORT COMPLIANCE PERIOD: JANUARY 1, 2019 TO JUNE 30, 2019

UNIT	TAG	CLASS	PLACED ON DELAY	REMOVED FROM DELAY
		NO C	OMPONENTS ARE ON DEL	AV OF BEDAID
			OW ONE WITO AIRE ON DEL	AT OF REPAIR
	=		TOTAL:	0

MONROE ENERGY TRAINER REFINERY ADDED AND DELETED EPA VV/GGG REPORT REPORT DATE: JANUARY 21, 2019

REPORT COMPLIANCE PERIOD: JULY 1, 2018 THROUGH DECEMBER, 2018

HIVID			, 2010
UNIT 543 CRUDE	CLASS	ADDED	DELETED
	PUMP	0	0
543 CRUDE	VALVE	0	6
544 CRUDE	PUMP	0	0
544 CRUDE	VALVE	0	6
544 VACUUM	PUMP	0	0
544 VACUUM	VALVE	0	4
ALKY	PUMP	0	0
ALKY	VALVE	14	2
AMINE	PUMP	0	0
AMINE	VALVE	6	0
AWWTP	VALVE	0	0
BLEND	PUMP	0	0
BLEND	VALVE	3	0
BOILER	VALVE	0	78
BOILER 14	VALVE	0	0
BOILERS 9 & 10	VALVE	0	0
BUTANE	VALVE	0	
CRUDE	PUMP	0	0
CRUDE	VALVE	ő	0
DESALT	PUMP	0	0
DESALT	VALVE		0
DIESEL	PUMP	0	0
DIESEL	VALVE	0	0
FCC	PUMP	0	0
FCC	VALVE	0	0
FLARE	PUMP	7	0
FLARE	VALVE	0	0
FLARE GAS RECOVERY	PUMP	11	0
FLARE GAS RECOVERY	VALVE	0	0
ISOCRK	PUMP	0	0
ISOCRK	VALVE	0	0
KERO		0	0
KERO	PUMP	0	0
LOWLN	VALVE	1	0
LOWLN	PUMP	0	0
MARINE	VALVE	10	0
	PUMP	0	0
MARINE	VALVE	0	0
NAPHTH	PUMP	0	0
NAPHTH	VALVE	35	26
DYF	VALVE	0	0
PLATFO	PUMP	0	0
PLATFO	VALVE	1	0
PRORCL	PUMP	0	0
PRORCL	VALVE	0	0
PROREC	PUMP	0	0
ROREC	VALVE	2	0
PROSTO	PUMP	0	0
		(0.75)	U

VGO	VALVE	2	0 5
VGO	PUMP	0	0
VACUUM	VALVE	0	
VACUUM	PUMP	0	0
ULSG	VALVE	0	0
ULSG	PUMP	0	0
TF	VALVE	0	8
TF	PUMP	0	0
TAIL GAS	VALVE	0	0
SUNOL	VALVE	0	0
SUNOL	PUMP	0	0
SRU	VALVE	0	0
SOUTH TANK FARM	VALVE	12	8
SOUTH TANK FARM	PUMP	0	0
SOUR	VALVE	0	0
SOUR	PUMP	0	0
REFORM	VALVE	0 2	0
REFORM	PUMP	0	0
PROSTO	VALVE	•	

Attachment 2: REFINERY MACT (RMACT HAP Units) LDAR Report, per 40 CFR, Part 63, Subpart CC

MONROE ENERGY TRAINER REFINERY

EPA MACT CC LDAR UNIT SUMMARY

REPORT DATE: JULY 9, 2019

REPORT PERIOD: JANUARY 1, 2019 TO JUNE 30, 2019

UNIT	CLASS	MONTH	MONITORED	LEAKDED	LATE REPAIR
543 CRUDE					TAIL NEI AIR
	PUMP	1			
	PUMP	2	4	0	0
	PUMP	3	4	0	0
	PUMP	4	4	0	0
	PUMP	5	4	0	0
	PUMP	6	4	0	0
	VALVE	1	4	0	0
	VALVE	2	9	0	0
	VALVE	3	1,071	3	0
	VALVE	4	3 3	0	0
	VALVE	5	1,069	0	0
	VALVE	6	2	2	0
			2	0	0
			<u>2,181</u>	<u>5</u>	<u>o</u>
544 CRUDE					-
	PUMP	1	15	0	
	PUMP	2	15	0	0
	PUMP	3	15	0	0
	PUMP	4	15	0	0
	PUMP	5	15	0	0
	PUMP	6	15	0	0
	VALVE	1	2	0	0
	VALVE	2	1,167	0	0
	VALVE	5	1,167	0	0
					Ü
			<u>2,426</u>	<u>o</u>	<u>o</u>
44 VACUUM					: -
	PUMP	1	2	0	
	PUMP	2	2	0	0
	PUMP	3	2	0	0
	PUMP	4	2	0	0
	PUMP	5	2	0	0
	PUMP	6	2	0	0
	VALVE	2	399	0	
	VALVE	5	398	0	0
			900	-	
<u>-KY</u>			<u>809</u>	<u>0</u>	<u>0</u>
TAT CONTRACTOR OF THE PARTY OF	DUMP				
	PUMP	1	26	0	0

MACT CC UNITS

	PUMP	2	27	0	91000
	PUMP	3	27	0	0
	PUMP	4	27	0	0
	PUMP	5	27	0	0
	PUMP	6	27	0	0
	VALVE	1	1,485	3	0
	VALVE	2	3,280	8	0
	VALVE	3	64	0	0
	VALVE	4	10	0	0
	VALVE	5	3,303	6	0
	VALVE	6	9	1	0
					U
			<u>8,312</u>	<u>18</u>	<u>o</u>
<u>AMINE</u>					
	PUMP	1	2	0	•
	PUMP	2	2	0	0
	PUMP	3	2	0	0
	PUMP	4	2	0	0
	PUMP	5	2	0	0
	PUMP	6	2		0
	VALVE	1	360	0 1	0
	VALVE	2	3	0	0
	VALVE	3	1	0	0
	VALVE	4	361	0	0
	VALVE	5	4	0	0
					U
			<u>741</u>	<u>1</u>	<u>0</u>
<u>AWWTP</u>					
	VALVE	1	140	0	200
	VALVE	4	140	0	0
				0	0
			<u>280</u>	<u>o</u>	<u>o</u>
BLEND					_
	PUMP	1	18	0	•
	PUMP	2	18	0	0
	PUMP	3	18	0	0
	PUMP	4	18	0	0
	PUMP	5	17	0	0
	PUMP	6	18	0	0
	VALVE	1	1,435	4	0
	VALVE	2	4	0	0
	VALVE	3	4	0	0
	VALVE	4	1,432	3	0
	VALVE	5	5	0	0
	VALVE	6	3	0	0
				1. 3 0	U
			<u>2,990</u>	<u>7</u>	<u>o</u>
					55.3

BOILER 14					
	VALVE	1	1	•	
	VALVE	2	49	0	0
	VALVE	3	49	0	0
	VALVE	5	49	0	0
	VALVE	6	49	0	0
				U	0
			<u>197</u>	<u>o</u>	0
DOU EDG 0 0 40				<u> </u>	<u>0</u>
BOILERS 9 & 10					
	VALVE	2	440	0	0
	VALVE	3	439	1	0
	VALVE	4	1	0	0
	VALVE	5	439	1	0
	VALVE	6	439	0	0
			<u>1,758</u>	<u>2</u>	<u>0</u>
BUTANE					
	VALVE	1			
	VALVE	2	3	0	0
	VALVE	5	301	0	0
	원하 <u>인</u> 지 생시고	3	304	0	0
			<u>608</u>		
			000	<u>o</u>	<u>o</u>
DESALT					
	PUMP	1	10	0	0
	PUMP	2	10	0	0
	PUMP	3	10	0	0
	PUMP	4	10	0	0
	PUMP	5	10	0	0
	PUMP	6	10	0	0
	VALVE	1	813	2	0
	VALVE	2	2	0	0
	VALVE	3	2	0	0
	VALVE	4	811	0	0
			<u>1,688</u>	<u>2</u>	<u>o</u>
DIESEL					
	PUMP	1	22	* ***	
	PUMP	2	11	0	0
	PUMP	3	11 11	0	0
	PUMP	4	11	0	0
	PUMP	5	11	0	0
	PUMP	6	11	0	0
	VALVE	1	778	0 3	0
	VALVE	2	3	0	0
	VALVE	3	3	0	0
	VALVE	4	778	1	0
	VALVE	5	1	0	0
					U

VALVE	6	1	0	0
		4 620	2	
FCC		<u>1,630</u>	4	<u>o</u>
PUMP	1	25	0	0
PUMP	2	25	0	0
PUMP	3	25	1	0
PUMP	4	25	0	0
PUMP	5	24	0	0
PUMP	6	25	0	0
VALVE	1	79	0	0
VALVE	2	2,203	2	0
VALVE	3	6	0	0
VALVE	4	2	0	0
VALVE	5	2,274	5	0
VALVE	6	6	0	0
		4,719	<u>8</u>	<u>o</u>
FLARE			_	<u>~</u>
PUMP	1	3	0	0
PUMP	2	3	0	0
PUMP PUMP	3	3	0	0
PUMP	4	3	0	0
PUMP	5	3	0	0
VALVE	6	3	0	0
VALVE	3	221	0	0
VALVE	6	222	0	0
		<u>461</u>	<u>0</u>	<u>o</u>
FLARE GAS RECOVERY				_
PUMP	1	-		
PUMP	2	7	0	0
PUMP	3	7	0	0
PUMP	4	7	0	0
PUMP	5	7	0	0
PUMP	6	7	0	0
VALVE	3	7	U	0
VALVE	6	1,048 1,047	0	0
	·	1,047	0	0
		2,137	<u>o</u>	<u>o</u>
ISOCRK				
PUMP	1	17	0	0
PUMP	2	18	0	0
PUMP	3	18	0	0
PUMP	4	18	0	0
PUMP	5	18	0	0
PUMP	6	18	0	0

	VALVE	1	3,132	7	0
	VALVE	2	21	0	0
	VALVE	3	7	0	0
	VALVE VALVE	4	3,129	5	0
		5	5	0	0
	VALVE	6	5	0	0
			2 980		
			<u>6,406</u>	<u>12</u>	<u>0</u>
KERO/HCN					
The second secon	PUMP	1			
	PUMP	2	9	0	0
	PUMP	3	9	0	0
	PUMP	4	9	0	0
	PUMP	5	9	0	0
	PUMP	6	9	0	0
	VALVE	1	9 1,525	0	0
	VALVE	2		3	0
	VALVE	3	6	0	0
	VALVE	4	3 1,525	0	0
	VALVE	5		2	0
	VALVE	6	2 2	0	0
		Ü	2	0	0
			3,117	_	
			5,117	<u>5</u>	<u>o</u>
LOWLN					
	PUMP	1	6	0	0
	PUMP	2	6	0	0
	PUMP	3	6	0	0
	PUMP	4	6	0	0
	PUMP	5	6	0	0
	PUMP	6	6	0	0
	VALVE	1	574	2	0
	VALVE	2	2	0	0
	VALVE	3	2	0	0
	VALVE	4	584	1	0
	VALVE	5	11	1	0
	VALVE	6	1	0	0
					1000
			1,210	<u>4</u>	<u>o</u>
MARINE					. = .
	PUMP	2			
	PUMP	1 2	2	0	0
	PUMP	3	2	0	0
	PUMP	4	2	0	0
	PUMP	5	2	0	0
	PUMP	6	2	0	0
	VALVE	1	2	0	0
	VALVE	2	288	0	0
	***************************************		200	0	0

	VALVE	5	290	0	0
			<u>592</u>	<u>o</u>	<u>o</u>
NAPHTH					-
	PUMP	1	4.00		
	PUMP	2	16	0	0
	PUMP	3	16	0	0
	PUMP	4	16	0	0
	PUMP	5	16	0	0
	PUMP	6	16	0	0
	VALVE	1	16 7	1	0
	VALVE	2	4	0	0
	VALVE	3	1,505	0	0
	VALVE	4	6	3	0
	VALVE	5		0	0
	VALVE	6	6	0	0
		U	1,515	3	0
			<u>3,139</u>	<u>7</u>	<u>o</u>
PLATFO					
	PUMP	1	8	0	_
	PUMP	2	8	0	0
	PUMP	3	8	0	0
	PUMP	4	8	0	0
	PUMP	5	8	0	0
	PUMP	6	8	0	0
	VALVE	1	12	0	0
	VALVE	2	6	0	0
	VALVE	3	2,151	3	0
	VALVE	4	3	0	
	VALVE	5	3	0	0
	VALVE	6	2,161	5	0
			4,384	<u>8</u>	<u>o</u>
PRORCL				_	-
	PUMP	1	1		
	PUMP	2	1	0	0
	PUMP	3	1	0	0
	PUMP	4	1	0	0
	PUMP	5	1	0	0
	PUMP	6	1	0	0
	VALVE	3	332	0 2	0
	VALVE	4	2		0
	VALVE	5	2	0	0
	VALVE	6	330	0 4	0
PROREC			<u>672</u>	<u>6</u>	<u>o</u>

	PUMP	1	2	0	0
	PUMP	2	2	0	0
	PUMP	3	2	0	0
	PUMP	4	2	0	0
	PUMP	5	2	0	0
	PUMP	6	2	0	
	VALVE	2	646	3	0
	VALVE	3	3	0	
	VALVE	4	3	0	0
	VALVE	5	638	6	0
	VALVE	6	8	0	0
				v	0
			1,310	<u>9</u>	0
PROSTO				_	<u>o</u>
<u>110310</u>					
	PUMP	1	3	0	0
	PUMP	2	3	0	0
	PUMP	3	3	0	0
	PUMP	4	4	0	0
	PUMP	5	4	0	0
	PUMP	6	4	0	0
	VALVE	1	530	2	0
	VALVE	2	2	0	0
	VALVE	3	3	0	0
	VALVE	4	530	1	0
	VALVE	5	1	0	0
	VALVE	6	2	0	0
			1,089	2	20
REFORM			11000	<u>3</u>	<u>0</u>
MEGCIKIM					
	PUMP	1	8	0	0
	PUMP	2	8	0	0
	PUMP	3	8	0	0
	PUMP	4	8	0	0
	PUMP	5	8	0	0
	PUMP	6	8	0	0
	VALVE	2	825	2	0
	VALVE	3	18	0	0
	VALVE	4	2	0	0
	VALVE	5	823	1	0
	VALVE	6	15	0	0
			<u>1,731</u>	<u>3</u>	
SOUR				≥	<u>o</u>
<u>Joon</u>	and a respectation				
	VALVE	2	53	0	0
	VALVE	5	53	0	0
			<u>106</u>	0	•
				<u>0</u>	<u>o</u>

SOUTH TANK FARM				
PUMF	1	25		
PUMF		24	0	0
PUMF		24	0	0
PUMP		25	0	0
PUMP	28	25	0	0
PUMP	0.000	24	0	0
VALVE		1	0	0
VALVE		1	0	0
VALVE		2,639	3	0
VALVE		15	0	0
VALVE		13	0	0
VALVE		2,641	2	0
				v
		<u>5,457</u>	<u>5</u>	<u>0</u>
<u>SRU</u>				
VALVE	. 4	77	0	0
VALVE	4	76	0	0
				v
		<u>153</u>	<u>0</u>	<u>o</u>
TAIL GAS				
VALVE	1	162	0	200
VALVE		2	0	0
VALVE		162	1	0
VALVE		1	0	0
VALVE		1	0	0
				Ü
		<u>328</u>	1	<u>o</u>
<u>IF</u>				
PUMP	1	10	0	
PUMP	2	10	0	0
PUMP	3	10	0	0
PUMP	4	10	0	0
PUMP	5	10	0	0
PUMP	6	10	0	0
VALVE	3	896	0	0
VALVE	6	896	1	0
		<u>1,852</u>	2	<u>o</u>
ULSG				
PUMP	1	8	0	0
PUMP	2	8	0	0
PUMP	3	8	0	0
PUMP	4	8	0	0
PUMP	5	8	0	0
PUMP	6	8	0	0
VALVE	1	3	0	0

	VALVE	2	3	0	0
	VALVE	3	2,153	5	0
	VALVE	4	6	0	0
	VALVE	5	5	0	0
	VALVE	6	2,152	5	0
			4,370	40	
MACHILIA			4,010	<u>10</u>	<u>0</u>
VACUUM					
	PUMP	1	2	0	0
	PUMP	2	2	0	0
	PUMP	3	2	0	0
	PUMP	4	2	0	0
	PUMP	5	2	0	0
	PUMP	6	2	0	
	VALVE	1	496	3	0
	VALVE	2	5	0	0
	VALVE	3	3	0	0
	VALVE	4	496	1	0
	VALVE	5	1	0	0
	VALVE	6	1	0	0
					U
			<u>1,014</u>	<u>4</u>	<u>o</u>
<u>VGO</u>					
	PUMP	1	79	1401	
	PUMP	2	1	0	0
	PUMP	3	1	0	0
	PUMP	4	1	0	0
	PUMP	5	1	0	0
	PUMP	6	1	0	0
	VALVE	1	1	0	0
	VALVE	2	625 3	2	0
	VALVE	3		0	0
	VALVE	4	2	0	0
	VALVE	5	622	3	0
	VALVE	6	4	0	0
	a seculia Vida	O	3	0	0
			1,265	E	•
			-1200	<u>5</u>	<u>o</u>

Page 10 of 10

MONROE ENERGY TRAINER REFINERY
PLACED ON DELAY OF REPAIR
EPA VV/GGG REPORT
REPORT DATE: JULY 9, 2019
REPORT COMPLIANCE PERIOD: JANUARY 1, 2019 TO JUNE 30, 2019

NO COMPONENTS ARE ON DELAY OF REPAIR

MONROE ENERGY TRAINER REFINERY REMOVED FROM DELAY EPA VV/GGG REPORT REPORT DATE: JULY 9, 2019 REPORT COMPLIANCE PERIOD: JANUARY 1, 2019 TO JUNE 30, 2019

NO COMPONENTS ARE ON DELAY	Y OF REPAIR

MONROE ENERGY TRAINER REFINERY ADDED AND DELETED EPA VV/GGG REPORT

MACT CC UNITS

REPORT DATE: JULY 9, 2019

REPORT COMPLIANCE PERIOD: JANUARY 1, 2019 TO JUNE 30, 2019

UNIT	CLASS	ADDED	
543 CRUDE	PUMP	ADDED 0	DELETED
543 CRUDE	VALVE	0	0
544 CRUDE	PUMP		6
544 CRUDE	VALVE	0	0
544 VACUUM	PUMP	0	6
544 VACUUM	VALVE	0	0
ALKY	PUMP		4
ALKY	VALVE	0 14	0
AMINE	PUMP	0	2
AMINE	VALVE		0
AWWTP	VALVE	6	0
BLEND	PUMP	0	0
BLEND	VALVE	3	0
BOILER	VALVE		0
BOILER 14	VALVE	0	78
BOILERS 9 & 10	VALVE	0	0
BUTANE	VALVE	0	0
CRUDE	PUMP	0	0
CRUDE	VALVE	0	0
DESALT	PUMP	0	0
DESALT	VALVE	0	0
DIESEL	PUMP	0	0
DIESEL	VALVE	0	0
FCC	PUMP	0	0
FCC	VALVE		0
FLARE	PUMP	7 0	0
FLARE	VALVE	1	0
FLARE GAS RECOVERY	PUMP	0	0
FLARE GAS RECOVERY	VALVE	0	0
ISOCRK	PUMP	0	0
ISOCRK	VALVE	0	0
KERO/HCN	PUMP	0	0
KERO/HCN	VALVE	1	0
LOWLN	PUMP	0	0
LOWLN	VALVE	10	0
MARINE	PUMP	0	0
MARINE	VALVE	0	0
NAPHTH	PUMP	0	0
NAPHTH	VALVE	35	0
OYF	VALVE	0	26
PLATFO	PUMP	0	0
PLATFO	VALVE		
PRORCL	PUMP	0	0
PRORCL	VALVE	0	0
PROREC	PUMP	0	0
PROREC	VALVE	2	
PROSTO	PUMP	0	0
PROSTO	VALVE	0	0
	Exception who is the whole destroyed	U	0

REFORM	PUMP	0	0
REFORM	VALVE	2	
SOUR	PUMP	0	0
SOUR	VALVE	0	0
SOUTH TANK FARM	PUMP	0	0
SOUTH TANK FARM	VALVE	12	8
SRU	VALVE	0	0
TAIL GAS	VALVE	0	0
TF.	PUMP	0	0
TF.	VALVE	0	8
JLSG	PUMP	0	0
JLSG	VALVE	0	0
/ACUUM	PUMP	0	Ö
ACUUM	VALVE	0	0
/GO	PUMP	0	0
GO	VALVE	2	5
	TOTAL:	96	143

Attachment 3: GGGa LDAR Report, per 40 CFR §60.590a, Subpart VVa/GGGa

MONROE ENERGY TRAINER REPORT GGGa SEMI ANNUAL LDAR REPORT

SUMMARY

REPORT DATE: JULY 9, 2019

			MONITORED	LEAKED	
543 CRUDE			A STATE OF THE STA		LATE REPAIR
	PUMP	1	4	0	0
	PUMP	2	FW1	8	
	PUMP	3	4	0	0
	PUMP	4	4	0	0
	PUMP	5	4	0	0
	PUMP	6	4	0	0
	RELIEF	2	8	0	0
	RELIEF	5	8	0	0
	VALVE	1	9	0	0
	VALVE	2	1,071	0 3	0
	VALVE	3	3		0
	VALVE	4	3	0	0
	VALVE	5	1,069	0 2	0
	VALVE	6	2		0
		875.8	2	0	0
			<u>2,197</u>	<u>5</u>	<u>o</u>
544 CRUDE					
	PUMP	1	15	0	
	PUMP	2	15	0	0
	PUMP	3	15	0	0
	PUMP	4	15	0	0
	PUMP	5	15	0	0
	PUMP	6	15	0	0
	RELIEF	2	8	0	0
	RELIEF	5	8	0	0
	VALVE	1	2	0	0
	VALVE	2	1,167	0	0
	VALVE	5	1,167	0	0
			<u>2,442</u>	0	
544 VACUUM				<u>o</u>	<u>o</u>
	PUMP				
	PUMP	1	2	0	0
	PUMP	2 3	2	0	0
	PUMP		2	0	0
	PUMP	4 5	2	0	0
	PUMP		2	0	0
	RELIEF	6 2	2	0	0
	RELIEF	5	7	0	0
	VALVE	2	7	0	0
	VALVE	5	399	0	0
		3	398	0	0

		823	<u>o</u>	<u>o</u>
BOILER 14			_	<u>u</u>
VALV		1	0	0
VALV		49	0	0
VALVE	20	49	0	0
VALVE	227.0	49	0	0
VALVE	6	49	0	0
		<u>197</u>	<u>0</u>	<u>0</u>
BOILERS 9 & 10				
RELIE	F 2	4	_	
RELIE	_	4	0	0
VALVE		440	0	0
VALVE	_	439	0	0
VALVE		439	1	0
VALVE	5/6/5	439	0	0
VALVE	5	439	1	0
	· ·	439	0	0
		1,766	2	20
		1,700	<u>2</u>	<u>0</u>
FLARE GAS RECOVERY				
PUMP	1	7	0	0
PUMP	2	7	0	0
PUMP	3	7	0	0
PUMP	4	7	0	0
PUMP	5	7	0	0
PUMP	6	7	0	0
RELIEF	3	20	0	0
RELIEF	6	20	0	0
VALVE	3	1,048	0	0
VALVE	6	1,047	0	0
		2,177	<u>o</u>	<u>o</u>
ULSG				-
PUMP		20		
PUMP	1	8	0	0
PUMP	2	8	0	0
PUMP	3	8	0	0
PUMP	4 5	8	0	0
PUMP	6	8	0	0
RELIEF	3	8	0	0
RELIEF	6	17	0	0
VALVE	1	17	0	0
VALVE	2	3	0	0
VALVE	3	3 153	0	0
VALVE	4	2,153	5	0
VALVE	5	6 5	0	0
VALVE	6	2,152	0	0
	- -x	2,102	5	0
		4,404	<u>10</u>	<u>o</u>

	TOTAL:	15,297	22	0
	TOTAL	<u>1,291</u>	<u>5</u>	<u>0</u>
VALVE	6	3	0	0
VALVE	5	4	0	0
VALVE	4	621	3	0
VALVE	3	2	0	0
VALVE	2	3	0	0
VALVE	1	624	2	0
RELIEF	6	2	0	0
RELIEF	5	2	0	0
RELIEF	4	13	0	0
RELIEF	1	11	0	0
PUMP	6	1	0	0
PUMP	5	1	0	0
PUMP	4	1	0	0
PUMP	3	1	0	0
PUMP	2	1	0	0
PUMP	1	1	0	0

MONROE ENERGY TRAINER REPORT GGGa SEMI ANNUAL LDAR REPORT COMPONENTS ON DELAY OF REPAIR REPORT DATE: JULY 9, 2019

CLASS	DATE PLACED ON DELAY
NENTS PLACED ON DOR E	OP PEROPTING PERIOR
THE PROPERTY OF THE PROPERTY O	OR REPORTING PERIOD
TOTAL	0
	DNENTS PLACED ON DOR F

MONROE ENERGY TRAINER REPORT GGGa SEMI ANNUAL LDAR REPORT COMPONENTS REMOVED FROM DELAY OF REPAIR REPORT DATE: JULY 9, 2019

TAG	UNIT	CLASS	DATE PLACED ON DELAY
NO GG	Sa COMPONENTS	REMOVED ERON DOD	OR DEPOSITE FLACED ON DELAY
	STATE OF THE PARTY	KEWOVED FROM DOR F	FOR REPORTING PERIOD
		TOTAL:	

MONROE ENERGY TRAINER REPORT GGGa SEMI ANNUAL LDAR REPORT COMPONENTS ADDED AND DELETED

REPORT DATE: JULY 9, 2019

UNIT	CLASS	Karamatan Pa	ANDER	
543 CRUDE	CONNECTOR		ADDED	DELETED
543 CRUDE	PRESSURE RELIEF DEVICE		0	0
543 CRUDE	PUMP		0	0
543 CRUDE	VALVE		0	0
544 CRUDE	PRESSURE RELIEF DEVICE		0	6
544 CRUDE	PUMP		0	0
544 CRUDE	VALVE		0	0
544 VACUUM	PRESSURE RELIEF DEVICE		0	6
544 VACUUM	PUMP		0	0
544 VACUUM	VALVE		0	0
BOILER 14	VALVE		0	4
BOILERS 9 & 10	CONNECTOR		0	0
BOILERS 9 & 10	PRESSURE RELIEF DEVICE		0	0
BOILERS 9 & 10	VALVE		0	0
FLARE GAS RECOVERY	COMPRESSOR		0	0
FLARE GAS RECOVERY	PRESSURE RELIEF DEVICE		0	0
FLARE GAS RECOVERY	PUMP		0	0
FLARE GAS RECOVERY	VALVE		0	0
ULSG	COMPRESSOR		0	0
ULSG	PRESSURE RELIEF DEVICE		0	0
ULSG	PUMP		0	0
JLSG	VALVE		0	0
/GO	COMPRESSOR		0	0
/GO	CONNECTOR		0	0
/GO	PRESSURE RELIEF DEVICE		0	0
/GO	PUMP		2	2
/GO	VALVE		0	0
			2	5
		TOTAL:	4	23